

February 15, 2013

BY ELECTRONIC DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Progeny LMS, LLC
Permitted Oral *Ex Parte* Presentation
WT Docket No. 11-49

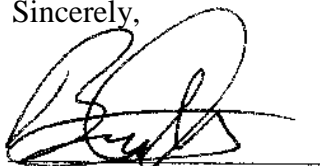
Dear Ms. Dortch:

On February 13, 2013, representatives of Progeny LMS, LLC (“Progeny”) met with Commission officials to discuss the progress of Progeny’s development of its multilateration location and monitoring service (“M-LMS”) network. Participating in the meeting on behalf of the Commission were Chairman Julius Genachowski; Ruth Milkman, Chief of the Wireless Telecommunications Bureau; Renee Gregory, Legal Advisor to the Chairman; and Russell Caditz-Peck, Special Assistant to the Chairman. Participating in the meeting on behalf of Progeny were Rajendra Singh, Chairman of the Board for Progeny, Gary Parsons, CEO of Progeny, Ganesh Pattabiraman, President of Progeny, and the undersigned.

The bulk of the meeting focused on the status of the development of the Progeny network and the results of wireless location accuracy testing that was conducted in December 2012 by Working Group 3 of the Commission’s Communications Safety Reliability and Interoperability Council. The discussion also briefly addressed the results of independent and joint tests that were conducted to demonstrate Progeny’s compliance with Section 90.353(d) of the Commission’s rules. Progeny briefly explained why the tests demonstrate that its service will not cause unacceptable levels of interference to Part 15 devices. The points that were made by the Progeny representatives with respect to the Part 15 testing are addressed in detail in Progeny’s January 11, 2013 response to comments that were filed addressing the test reports.

Thank you for your attention to this matter. Please contact the undersigned if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce A. Olcott", written over a horizontal line.

Bruce A. Olcott
Counsel to Progeny LMS, LLC